

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

Promoting Broadband Internet Access for Veterans	)	WC Docket No. 18-275
	)	
	)	
In the Matter of	)	WC Docket No. 17-287
Bridging the Digital Divide for Low-	)	
Income Consumers, Lifeline and Link Up	)	
Reform and Modernization	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Telecommunications Carriers	)	WC Docket No. 09-197
Eligible for Universal Service	)	
Support	)	

**NATIONAL LIFELINE ASSOCIATION COMMENTS ON PROMOTING BROADBAND  
INTERNET ACCESS FOR VETERANS**

The National Lifeline Association<sup>1</sup> (NaLA) respectfully submits these comments in response to the Public Notice Seeking Comment on Promoting Broadband Internet Access for Veterans.<sup>2</sup> In the Public Notice, the Wireline Competition Bureau (Bureau) seeks information on promoting broadband access for low-income veterans in order to prepare and submit a report to Congress on “promoting broadband Internet access service for veterans, in particular low-income veterans and veterans residing in rural areas” pursuant to Section 504 of the RAY BAUM’s Act of 2018.<sup>3</sup> The Bureau asks “Do any programs focus on low-income veterans and veterans in rural areas” without

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<sup>1</sup> NaLA is the only industry trade group specifically focused on the Lifeline segment of the communications marketplace. It supports eligible telecommunications carriers (ETCs), distributors, Lifeline supporters and participants and partners with regulators to improve the program through education, cooperation and advocacy. See <https://www.nalalifeline.org/>.

<sup>2</sup> *Wireline Competition Bureau Seeks Comment on Promoting Broadband Internet Access Service for Veterans*, WC Docket No. 18-275, Public Notice, DA 18-947 (Sept. 12, 2018).

<sup>3</sup> *Id.* at 1.

any mention of the Commission's Lifeline program.<sup>4</sup> As the Bureau is aware, the Lifeline program helps to make broadband services affordable for low-income Americans, including up to 1.3 million veterans,<sup>5</sup> and was specifically modified in 2016 to include the Veterans Pension and Survivors Pension benefit as an eligibility program.<sup>6</sup>

NaLA applauds the Commission for seeking comment on how to provide better and more affordable access to broadband Internet services for low-income veterans and veterans living in rural areas. However, the Commission's proposal to eliminate wireless resellers from the Lifeline program would cause more than 7.1 million low-income Americans, including up to 1.3 million low-income veterans and a large percentage of rural subscribers to lose their preferred voice and broadband service providers and leave them with either no affordable service options or service options that are less affordable than the panoply of low or no-cost options that wireless resellers offer today. The Lifeline program currently serves low-income veterans and veterans in rural areas. As reported in NaLA's comments on last year's Lifeline NPRM,

Based on an analysis of over 3.2 million Lifeline subscribers to services provided by NaLA members, 40 percent of subscribers reside in urban zip codes and 60 percent reside in suburban (33 percent) or **rural (27 percent) zip codes**.<sup>7</sup> In a survey of nearly 40,000 NaLA member subscribers, NaLA found that over 55 percent of respondents are female, over 34 percent are over the age of 55 (and nearly half are over 50), over 40 percent identify as Caucasian (the largest demographic by nearly a

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<sup>4</sup> *Id.* at 4.

<sup>5</sup> See Rob Coons, "Veterans and military families need internet to connect to our economy," The Hill (Nov. 28, 2017), available at <https://thehill.com/opinion/technology/361888-veterans-and-military-families-need-internet-to-connect-to-our-economy>.

<sup>6</sup> See *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38, ¶¶ 173-76 (2016) (Lifeline Modernization Order).

<sup>7</sup> These breakdowns are based on analyses from GreatData.com, which uses population data from the United States Census, United States Department of Agriculture rural area designations and analyses of distances from metropolitan areas. See <https://greatdata.com/product/10/rural-urban> (last visited Feb. 12, 2018).

factor of 2), **nearly 18 percent indicate that they or a member of their household served in the military**, over 36 percent identify as disabled and unable to work and more than half live in a household that earned less than \$10,000 last year.<sup>8</sup>

In its reply comments NaLA noted that facilities and non-facilities based wireless carriers, facilities-based wireline carriers, state and local regulators, Tribal regulators, groups representing seniors, minorities, and children, progressive public interest and civil society groups and top conservative telecommunications policy thought leaders, all opposed the Commission's proposal to ban resellers from the Lifeline program. Included among these voices in opposition to the Commission's proposal were veterans groups. Specifically, the Korean War Veterans Association and the National Association of American Veterans opposed the Commission's proposal because it would "have devastating consequences for millions of service members and veterans who rely on Lifeline service to access health care resources, find and keep jobs, participate in educational programs, and keep in touch."<sup>9</sup> Finally, NaLA specifically referenced Section 504 of the RAY BAUM'S Act (which was later signed into law) and the fact that the Commission's proposal to eliminate wireless resellers from the Lifeline program was at odds with its Congressional directive to the Commission to promote broadband access for low-income veterans.<sup>10</sup>

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<sup>8</sup> Comments of the National Lifeline Association, WC Docket Nos. 17-287, 11-42, 09-197 at 8 (Feb. 21, 2018) (emphasis added).

<sup>9</sup> Korean War Veterans Association *Ex Parte* Letter, WC Docket Nos. 17-287, 11-42, 09-197 at 1-2 (Feb. 17, 2018); National Association of American Veterans *Ex Parte* Letter, WC Docket Nos. 17-287, 11-42, 09-197 at 1-2 (Nov. 9, 2017).

<sup>10</sup> See Reply Comments of the National Lifeline Association, WC Docket Nos. 17-287, 11-42, 09-197 at n.12 (Mar. 23, 2018) ("section 504 of the RAY BAUM's Act, H.R. 4986, championed by House Energy and Commerce Committee Chairman Walden and Subcommittee on Communications and Technology Chairman Blackburn, and passed by the full House of Representatives on March 6, 2018, requires the Commission to prepare a report on promoting broadband Internet access service for veterans, in particular low-income veterans. See H.R. 4986, 115th Cong. § 504. The unanimous opposition to the Commission's proposal to eliminate resellers, including by groups representing veterans, strongly suggests that the proposal would make

In its Connected Care Notice of Inquiry (NOI) regarding the creation of “an experimental ‘Connected Care Pilot Program’ to support the delivery of ... telehealth services to low-income Americans,”<sup>11</sup> the Commission recognized that “For low-income Americans facing obstacles to obtaining health care—especially those living in rural areas, women, and veterans—the potential of telehealth services to improve access to affordable health care is particularly significant.”<sup>12</sup> However, as in the Lifeline program, the Commission sought comment on limiting the Connected Care Pilot program from the outset by “requiring broadband service providers participating in the pilot program to be facilities-based” ETCs.<sup>13</sup> In its comments on the NOI, NaLA argued that, to achieve the fundamental goal of improving health outcomes for low-income individuals, the Commission should leverage resellers because,

as a result of their experiences and documented success in the Lifeline program, resellers (and in particular wireless resellers – mobile virtual network operators or MVNOs) have a unique expertise in locating, enrolling and serving the same communities that the Connected Care Pilot Program seeks to serve, i.e., low-income consumers and veterans.<sup>14</sup>

The Lifeline program already helps to make broadband Internet access more available and affordable for low-income veterans and veterans in rural areas. The Commission should work with Lifeline service providers and stakeholders to strengthen the Lifeline program to help meet its

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broadband services less available and affordable for low-income veterans, which is the opposite of the directive in Section 504.”).

<sup>11</sup> See *Promoting Telehealth for Low-Income Consumers*, WC Docket No. 18-213, Notice of Inquiry, FCC 18-112 (rel. Aug. 3, 2018).

<sup>12</sup> *Id.* at ¶ 9.

<sup>13</sup> *Id.* at ¶ 37.

<sup>14</sup> NaLA Comments on Connected Care Pilot Program Notice of Inquiry, WC Docket No. 18-212, at 3 (filed Sept. 10, 2018).

telehealth goals and to meet the obligations imposed on the Commission by Congress in Section 504 to serve low-income and rural veterans.

Respectfully submitted,

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